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Sent: Tuesday, July 22, 2014 2:29 PM
To: Bobby Johnson
Cc: Chas.Ariss@deq.idaho.gov; Ed.Hagan@deq.idaho.gov; Tonia.Mitchell@deq.idaho.gov
Subject: RE: Tomorrow's Rule making.

Bobby, that was a very interesting negotiated rulemaking session. I do have a comment on Section 430, Gas Processing Facilities that we did not have time to address, nor was the climate conducive to holding a productive discussion. It involves the nebulous nature of the "Facility Plan" within IDL Rules.

§ 430.02. states "Gas processing facilities must account for all liquids and gas entering and leaving the facility with accurate meters. Supervisory control and data acquisition systems must be used to monitor the liquids and gas. Operators of gas processing facilities must submit an as-built facility design plan to the Department upon completion of the facility."

This does not address the minimum documentation requirements for the facility plan. Currently, the Gas Processing Facility operator could submit a P&ID, process flow schematics and a site plat and IDL would not be able to reject this documentation as being inadequate. If IDL inserts language into the Rule that defines the minimum requirements for an acceptable Facility Plan then you will at least have a minimal level of "adequate" documentation in the event that something catastrophic happens.

IDEQ Wastewater Rules has listed minimum requirements for documents meeting what was described in today's rulemaking as constituting a facility plan. IDL's "facility plan" content would appear in multiple documents that DEQ receives; these documents include the Preliminary Engineering Report, Plans and Specifications and Operations and Maintenance Manuals. I encourage IDL to expand § 430.02. to include subsections that list the minimum documentation requirements to qualify to be called a Facility Plan. Please review IDEQ's Wastewater Rules, IDAPA 58.01.16 § 410, 411 and 420.

Examples of minimum documentation to appear in a Facility Plan, in my humble opinion, should include:

1. Site layout
2. P&ID
3. Process Flow schematics
4. Electronic controls and sensing (flow, temperature & pressure meters) schematic
5. Equipment Operations and Maintenance Manuals for:
 - a. Pumps
 - b. Meters

- c. Heat exchangers
- d. Any other operationally critical equipment that requires periodic maintenance and calibration
- 6. Periodic Maintenance schedule for critical equipment
- 7. Troubleshooting metric
- 8. And any other information or documentation that is deemed necessary for the safe and continued operation of this gas processing facility.

This issue of submitting As-Built drawings and documentation for any site or equipment changes should still be required, but if the facility is completed in substantial compliance with the Facility Plan, then a letter from the owner/operator's engineer overseeing the construction stating this fact should meet that requirement.

Thank you for the opportunity to comment on your Rules.

Regards

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"Everything should be made as simple as possible, but not simpler."
Albert Einstein